

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PETER D. SCHIFF, AND EURO PACIFIC  
CAPITAL INC.,

Plaintiffs,

vs.

YAYI INTERNATIONAL INC.,

Defendant.

15 Civ. 00359 (VSB)

**PLAINTIFFS' NOTICE OF MOTION  
FOR LEAVE TO FILE FIRST  
AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the annexed affirmation of Christopher Ayers, affirmed on April 30, 2015, and upon the exhibits attached thereto, the accompanying Memorandum of Law in support of this motion, and the pleadings herein, plaintiffs ("Plaintiffs"), will move this Court before the Honorable Judge Broderick, United States District Judge, for an order pursuant to Fed. R. Civ. P. 15(a) granting Plaintiffs leave to file their proposed First Amended Complaint, and granting such other and further relief as the Court deems just and proper.

**I declare under penalty of perjury that the foregoing is true and correct.**

Dated: April 30, 2015  
New York, New York

**ANDERSON KILL P.C.**

/s/ Christopher L. Ayers  
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